

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING
CASPER DIVISION

THE TRIAL LAWYERS COLLEGE, a nonprofit corporation)	
)	
)	CIVIL ACTION NO. 1:20-cv-0080
Plaintiff,)	
)	
v.)	
)	JUDGE CARSON
GERRY SPENCES TRIAL LAWYERS COLLEGE AT THUNDERHEAD RANCH, a nonprofit corporation, <i>et al.</i>)	MAGISTRATE JUDGE FOURATT
)	
)	
Defendants.)	

PLAINTIFF THE TRIAL LAWYERS COLLEGE'S AMENDED LISTING OF OTHER WITNESSES

Plaintiff The Trial Lawyers College ("TLC") hereby provides its Listing of Additional Witnesses in this matter pursuant to this Court's Third Scheduling Order (Rec. Doc. 313). In submitting this Listing of Other Witnesses, TLC does not waive any objections to relevance, materiality, privilege, or admissibility of evidence in this action or any other action or proceeding.

TLC'S AMENDED ADDITIONAL WITNESS LIST

In accordance with the parameters outlined in the Court's Third Scheduling Order (Rec. Doc. 313), and in addition to those witnesses TLC previously identified in its Initial Disclosures and Witness List (Rec. Doc. 157), TLC identifies the following additional individuals as witnesses that may be called at trial:

1. A representative of Gerry Spence Method at Thunderhead Ranch, Inc. to testify regarding the facts and circumstances related to this matter and alleged in Plaintiff's Third Amended Complaint.

2. Mel Orchard, Jackson, Wyoming, to testify regarding his service as a Board member for the Trial Lawyers College; Mr. Orchard's interactions with TLC, TLC alumni, and Defendants; and any other relevant information and/or documents and/or circumstances related to the claims and defenses in this case.
3. Mike Chaloupka, Ft. Collins, Colorado, to testify regarding confusion caused within the legal community as a result of Defendants' unlawful actions and/or documents and/or circumstances related to the claims and defenses in this case.
4. Janet Ritz, Ft. Collins, Colorado, to testify regarding confusion caused within the legal community as a result of Defendants' unlawful actions and/or documents and/or circumstances related to the claims and defenses in this case.
5. Phillip Chupik, Ft. Collins, Colorado, to testify regarding confusion caused within the legal community as a result of Defendants' unlawful actions and/or documents and/or circumstances related to the claims and defenses in this case.
6. Patrick DiBenedetto, Ft. Collins, Colorado, to testify regarding confusion caused within the legal community as a result of Defendants' unlawful actions and/or documents and/or circumstances related to the claims and defenses in this case.
7. Elizabeth Ousley, Louisville, Kentucky, to testify regarding confusion caused within the legal community as a result of Defendants' unlawful actions and/or documents and/or circumstances related to the claims and defenses in this case.
8. Jennifer Merchant, address unknown, to testify regarding the authentication of documents identified in TLC's production as TLC031023-TLC031029.
9. Patrick McLain, Dallas, Texas, to testify regarding his personal experience with the F Warriors, including its confidentiality obligations to TLC regarding TLC's trade secrets,

and any other relevant information and/or documents and/or circumstances related to the claims and defenses in this case.

10. A representative of the F Warriors, to testify regarding the confidentiality of TLC's trade secrets and/or documents and/or circumstances related to the claims and defenses in this case.
11. Any additional witness needed to authenticate an exhibit in this case.
12. Any witness listed by any other party in this matter related to the claims and defenses in this case.

Respectfully submitted,

THE TRIAL LAWYERS COLLEGE

/s/ Christopher K. Ralston

Christopher K. Ralston, (La. Bar #26706)

(Admitted *pro hac vice*)

Lindsay Calhoun, (La. Bar #35070)

(Admitted *pro hac vice*)

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**ATTORNEYS FOR PLAINTIFF THE TRIAL
LAWYERS COLLEGE**

CERTIFICATE OF SERVICE

I hereby certify that true and correct copy of the foregoing document has been served via ECF and/or e-mail this 11th day of July, 2022.

/s/ Christopher K. Ralston
Christopher K. Ralston